

Wiltshire Council Planning Consultation Response

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Application No: PL/2026/05043 & PL/2026/05048
New exterior paint to the shopfront along with hand-painted signage
32 Silver Street, Bradford On Avon, BA15 1JX

Please find following comments in respect of the above applications.

Recommendations:

☐	No comment
☐	Support in principle subject to amendments to the scheme (as set out below)
☐	Support subject to conditions (as set out below)
☐	Object (for reasons set out below)
☒	No objections

Scope of comments: the following comments relate to the built historic environment.

National Policy and guidance: From the point of view of the historic environment the main statutory tests are set out within the Planning (Listed Building and Conservation Areas) Act 1990. Sections 16 (LBC) and 66 (PP) require that **special regard** be given to the desirability of preserving or listed buildings, their settings or any features of special architectural or historic interest which they possess.

Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 also requires the Council to pay **special attention** to the desirability of preserving or enhancing the character or appearance of designated Conservation Areas.

The NPPF (August 2026) sets out Government planning policy for England. Chapter 20, *Conserving and enhancing the historic environment*, recognises heritage assets as an irreplaceable resource. Heritage assets should be conserved in a manner appropriate to their significance, with harm avoided unless there is a clear and convincing justification. Decision-makers are required to apply a balanced approach, giving substantial weight to the conservation of heritage assets and weighing any harm to significance against the public benefits of the proposal.

National Planning Practice Guidance provides guidance on interpreting the NPPF.

Historic England's Conservation Principles, Policies and Guidance (2008) provides policy and guidance for the "sustainable management of the historic environment". Additional relevant guidance on the application of policies set out in the NPPF is contained within their publications:

- Historic Environment Good Practice Planning Advice Note 2 – Managing Significance in Decision-Taking in the Historic Environment (2015)
- Historic Environment Good Practice Planning Advice Note 3 – The Setting of Heritage Assets 2nd edition (2017)
- Historic England Advice Note 2 – Making changes to Heritage Assets (2025)

“The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3” (HE GPA3) which notes that “The importance [of setting] lies in what the setting contributes to the significance of the heritage asset or to the ability to appreciate that significance.”

Local Policy: The Council’s Core Strategy Policy CP58 ‘Ensuring the conservation of the historic environment’ requires that “designated heritage assets and their settings will be conserved, and where appropriate enhanced, in a manner appropriate to their significance.” It is also required that distinctive elements of Wiltshire’s historic environment, including non-designated heritage assets, which contribute to a sense of local character and identity will be conserved, and where possible enhanced.

The Council’s Core Strategy CP 57: Ensuring high-quality design requires a high quality of design in all new developments. Proposals are required to “demonstrate how the proposal will make a positive contribution to the character of Wiltshire through (amongst other things) “enhancing local distinctiveness by responding to the value of the natural and historic environment, relating positively to its landscape setting and the existing pattern of development” and “responding positively to the existing townscape and landscape features in terms of building layouts, built form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and rooflines to effectively integrate the building into its setting.”

Proposal: The proposed scheme looks to repaint the existing masonry surrounding the shop front (ground floor) & the shop front and create new shop signage.

Relevant planning history: Numerous applications for change of use and alterations to the shop, including change of use.

Issues: impact on the listed building, impact on the setting of neighbouring listed buildings, impact on the conservation area.

Information considered/provided: Policy HE5 of the NPPF requires applicants to assess the significance of any heritage assets affected by a proposal, including the contribution made by their setting, and to identify the likely effects of the development on that significance. Sufficient information should be provided to enable a clear understanding of the significance of the heritage asset, its setting, and an impact assessment of the proposed works.

Decision-makers must be satisfied that assessments accurately reflect the effects on heritage assets caused by development proposals and in this case the applications are accompanied by a Design and Heritage Statement which provides a good understanding of the history and significance of the building, and a brief impact assessment.

Significance of assets and contribution of setting: The NPPF defines significance as the “value of a heritage asset to this and future generations because of its heritage interest. The interest may be **archaeological, architectural, artistic or historic**. Significance derives not only from a heritage asset’s physical presence, but also from its setting.” Historic England assesses significance in a similar manner, referring to evidential, historic, aesthetic and communal values of a place.

The interest may be architectural, or historic as set out in the Town and Country Planning (Listed Building and Conservation Areas) Act 1990 S 1.

In this case the significance of the building lies largely with its historic fabric and architecture - its form, layout and early polite design, and its long-term use as a retail unit within the busy town location. These have significant aesthetic and architectural interest, and which contribute to the character of the conservation area.

The use of the ground floor as retail space was created in the mid-1800s, and the ad-hoc shop windows respond to the piecemeal changes that have occurred since, which contributes to the character and significance of the building, and its contribution to the street scene.

Assessment: Shops have continually evolved and altered, responding to changes in fashion and tastes, and to the changing needs of the retail spaces. The shop front and its associated signage is an important part of attracting trade and footfall, attracting attention to the shop. This helps create variety and interest within the main shopping areas.

The proposed works look to redecorate the shop front and masonry (ground floor) to a dark grey colour (Murmuration), with gold lettering above the entrance door. The street scene is made up of a mix of shop fronts, both traditional and more modern, which all contribute to the character of the conservation area. The mix of colours and styles change over time. The proposed scheme forms part of that evolving change and helps bring a building back into active use as a retail space. The colour of shop fronts and signage is transient and changes, and therefore whilst the colour may be perceived as non-traditional, it represents the current trend and considerations.

It should be noted that any internal changes to create the new retail space, may require LBC.

Summary & conclusion: The NPPF confirms that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). It makes clear that any harm to a designated heritage asset requires clear and convincing justification.

The impact of the proposals on heritage assets will be neutral but have the benefit of bringing a retail space back into active use. The impact of the proposals on heritage assets will be largely positive, the heritage assets will be enhanced, and the requirements of current conservation legislation, policy or guidance are considered to be met and there is therefore no objection to the approval of the applications.